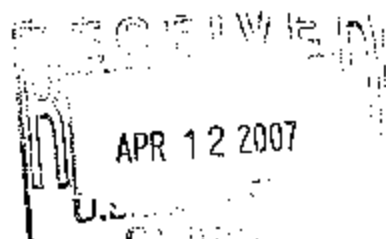


JUDGE SCHEINDLIN

07 CV 2924

JEFFREY H. WARD
Attorney at Law
2 Village Court
Hazlet, New Jersey 07730
(732) 888-2003
Attorney for Plaintiff(s)
JW3647



ALLSTATE INSURANCE COMPANY,
a/s/o RUBEN ROJAS

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Plaintiff(s),

Case Number:

vs.

Civil Action

JAMAL A. HORRY and DEPARTMENT OF STATE
OF THE UNITED STATES OF AMERICA

COMPLAINT

Defendant(s).

STATEMENT OF JURISDICTION

1. Defendant, Jamal A. Horry, is an individual citizen whose last known address is 129 W. 147 Street, #221, New York, New York 10039.
2. Defendant, Department of State of the United States of America, has a place of business c/o Office of the Legal Adviser, Suite 203, South Building, 2430 E. Street, NW, Washington, DC 20037.
3. Jurisdiction of this Court is based on the Federal Tort Claims Act, at 28 U.S.C. Section 1346 (b) 2671-2680.

FIRST COUNT:


1. On or about April 13, 2004, a motor vehicle owned by subrogor Ruben Rojas was being lawfully operated on the FDR Drive.
2. At the time and place aforesaid, Defendant, Jamal A. Horry, operated a motor vehicle, which was owned by Defendant, Department of State of the United States of America, in a negligent and careless manner, causing a collision to occur.

3. Upon information and belief, Defendant, Jamal A. Horry, was authorized to operate said motor vehicle at the time of the accident and/or was acting in the capacity of an agent, servant or employee of Defendant, Department of State of the United States of America.

4. As a result of said collision, the motor vehicle owned by subrogor Ruben Rojas, sustained damages. Subrogee, Allstate Insurance Company, pursuant to the provisions of a policy of insurance issued to the subrogor, made payments to the subrogor in the amount of \$3,026.73, for the property damage to the motor vehicle. Subrogee now seeks payment from the Defendant tortfeasors for the amount paid to the subrogor for the property damage claim.

WHEREFORE, Judgment is demanded for \$3,026.73, together with lawful interest, attorneys fees and costs of suit incurred.

Dated: April 6, 2007


/s/ Jeffrey H. Ward, Esq.
Attorney for Plaintiff